Appendix B

Response to Comments: North Zone Roadside Salvage Environmental Assessment

The 30-day comment period for the North Zone Roadside Salvage Environmental Assessment (EA) ended April 20, 2012 after a notice of availability was posted in the Coeur d'Alene Press on March 21, 2012. Comment letters that were received are displayed in the table below. A summary of each substantive comment is organized first by commenter, then by resource. Each comment is followed by a response, which includes a discussion of how the comment is addressed in the North Zone Roadside Salvage EA, if appropriate.

Comment No.	Commenter	Type of Comment
1	Idaho Dept. of Fish & Game	Letter dated March 26, 2012
2	Idaho Dept. of Parks & Recreation	Letter dated April 3, 2012
3	Idaho Conservation League	Letter dated April 6, 2012
4	Kootenai Environmental Alliance	Letter dated April 20, 2012
5	The Lands Council	Letter dated April 20, 2012

Commenter 1 – Idaho Department of Fish and Game

Noxious Weeds:

Comment 1-1: Local non-native invasive plant species and new invaders are likely to spread to and establish on sites where soil has been disturbed through road building, salvage operations, and burns. Invasive weed monitoring roads and roadsides after the completion of this project will increase the probability of quickly locating and treating new patches on non-native invasive plants.

> *Response 1-1: Design features to reduce the risk of weed spread have been included in Chapter 2 of the EA (pages 27-29) and in the Noxious Weeds Report (pages 11-12). The proposed action is designed to follow appropriate district noxious weed control policy and guidelines including but not limited to monitoring, weed treatment, equipment cleaning, and weed-free seed mix. Mitigations are expected to have a moderate to high effectiveness in limiting spread of weeds currently found along roads.*

Aquatic Riparian Areas:

Comment 1-2: Buffers along riparian areas and stream corridors will decrease the impact of salvage logging on stream temperatures and sedimentation. Therefore, protecting steams according to INFISH recommendations would be beneficial to aquatic life.

> *Response 1-2: All projects include INFS standards, best management practices and design criteria that are protective of aquatic resources. The only project activities that would occur within Riparian Habitat Conservation Areas (RHCAs) would be limited to the road prism and could include actions such as brushing, blading and adding gravel to the driving surface. In general, these activities would be beneficial to the adjacent aquatic resources by improving drainage and reducing sediment delivery. Further discussion of RHCAs can be found in the Hydrology report beginning on page 11 and discussion regarding stream temperatures can be found on page 16.*

Wildlife Vegetative Screening:

Comment 1-3: Screening vegetative cover along roadways is important to many species and lessens the impact and disturbance of roadways on all wildlife. Consideration of leaving screening vegetation along roadways near riparian areas, natural openings, and along new regeneration cuts to beneficial.

Response 1-3: While it is true that preserving vegetative cover along roadways may lessen the impacts on wildlife, these needs must be weighed against potential human safety concerns including reduced visibility (blind spots and inability to see wildlife –particularly deer – about to step into the roadway). Since there would be no salvage in riparian zones and old growth stands, screening cover would not be greatly reduced in these areas. Similarly, natural openings with a narrow strip of vegetation between them and an adjacent roadway are uncommon on the North Zone and roadside clearing is not likely to greatly increase visibility into these areas. Where roadside clearing is proposed along regeneration cuts not yet providing screening cover, vegetation along the roadways would be left where it is feasible and the safety of travel along the roadway can be ensured.

Wildlife Cavity Nesting Season:

Comment 1-4: Removal of dead and dying trees during spring nesting season will have an impact on cavity nesting birds and mammals. Conducting the roadside salvage portion of the project outside the April-July nesting season to allow cavity nesting birds (identified as Species of Greatest Conservation Need in Idaho's Comprehensive Wildlife Conservation Strategy) to fledge their young.

Response 1-4: We recognize the loss of some cavity nesting habitat with the existing year-round personal firewood cutting that occurs outside the confines of this proposed project. The IPNF Forest Plan Appendix X Snag and Woody Debris Management Guidelines (USDA Forest Service 1987) directs that cavity habitat be "de-emphasized" within 200 feet of the centerline to provide snags for public use (personal-use firewood cutting) [Wildlife Report, p. 40]. The trees that would be targeted for salvage with this project are not likely to be "soft" snags, or those in advanced decay which would more typically be used by cavity nesting birds and mammals. Typically these snags are too advanced in decay for manufacturing any type of wood product.

Some protection to cavity nesting birds and mammals would be provided within BMUs or identified BORZ areas since harvest activities would be restricted during grizzly bear spring season (April 1 – June 15).

Commenter 2 – Idaho Dept. of Parks and Recreation

Comment 2-1: We appreciate the planning staff putting in recreation design features to protect groomed trail opportunities and developed recreation facilities like campgrounds and trailheads. If these design features are followed, the impacts to recreation should be minimal.

Response 2-1:
Thank you for the concurrence. Project design features will be carried through to implementation of the project.

Commenter 3 - Idaho Conservation League

Roadless Areas:

Comment 3-1: Unfortunately, the Environmental Assessment (EA) for the project does not describe whether or not the cutting, sale, or removal of timber would be authorized in IRAs as part of this project. The final EA and decision notice should address this matter, by disclosing whether or not the Forest Service intends to approve timber harvest within any of the roadless areas adjacent to roads slated for roadside salvage. Moreover, the EA should disclose whether or not the proposed treatments are consistent with the Idaho Roadless Rule.

Response 3-1: The table below identifies the North Zone Roadside Salvage roads that are associated with Inventoried Roadless Areas (IRA) under Alternative 2. This table, as well as a map of these road segments located in the project file, demonstrates consistency with the Idaho Roadless Rule.

Road #	Inventoried Roadless Area	Comments
281	Selkirk (Back Country Rest.)	NO
634	Selkirk (Backcountry Rest., General Forest)	Road Maintenance
432	Selkirk (Back Country Rest. and General Forest)	Units go to boundary, Road Maintenance -(this road is not near Kootenai Peak IRA)
408	Katka, Mt. Willard/LakeEstelle (Backcountry Rest)	Units go to boundary, Road Maintenance
232	Trestle Peak	Road is not near the IRA
275	Trestle Peak (Backcountry Rest)	Units go to boundary, Road Maintenance
419	Beetop	NO
419	Scotchman Peaks (Backcountry Rest., Wildland Rec.)	Units go to boundary, Road Maintenance
2294	Scotchman Peaks (Backcountry Rest., Wildland Rec.)	NO
278	Packsaddle (Backcountry Rest.)	Units go to boundary, Road Maintenance
278	Schafer Peak (General Forest)	Units go to boundary, Road Maintenance
2706	Schafer Peak	NO
1066	Packsaddle (Backcountry Rest.)	Units go to boundary, Road Maintenance
332	Packsaddle (Backcountry Rest.)	Units go to boundary, Road Maintenance
332	Magee (Backcountry Rest.)	Units go to boundary, Road Maintenance
332	East Cathedral Peak (Backcountry Rest.)	Units go to boundary, Road Maintenance

332A	West Fork Elk (Backcountry Rest.)	Units go to boundary, Road Maintenance
638	Blacktail (Backcountry Rest.)	Road Maintenance
2454	Saddle Mt. (Backcountry Rest.)	Road Maintenance
633	Kootenai Peak (General Forest)	Units go to boundary, Road Maintenance
2711	Schafer Peak (Backcountry Rest.)	Units go to boundary, Road Maintenance

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Commenter 4 – Kootenai Environmental Alliance

Fish Passage Barriers (FPB):

Comment 4-1: Nowhere in the EA is there any specific analysis relating to FPB that may be located in the areas where the activities would occur. Proposed activities would occur along-side over 400 miles of FS roads if this project were implemented. The Hydrology and Fisheries information found on pages 41 through 47 do not mention any FPB surveys that have been done or will be done in the areas where the activities are planned. There is no data for the estimated number of FPB that may be present in any of the areas. There are no expert agency comments in the EA as to how this project would be in full compliance with federal regulations including NFMA and the ESA if existing FPB in any project areas would not be removed if this project were implemented… The Decision Notice (DN) is required to meet the NEPA requirements at 40 CFR 1500.1(b). High quality data with expert agency comments are needed that confirm the EA is in fully compliance with NEPA at: 40 CFR 1500.2, 1500.3 and 1508.27(9) and 1508.27(10).

> *Response 4-1: Fish passage barriers are a recognized component of management on the IPNF and a great deal of effort has occurred to identify and prioritize these barriers based on which species are present, quantity of beneficial habitat upstream of the barrier, and whether any additional barriers exist downstream that we have no authority over. Barriers on the North Zone of the Forest are most commonly addressed at the Zone-wide level and less at the individual project level because of the costs associated with repairing or replacing them. As opportunities occur to acquire additional funding to address a barrier, the database is consulted to determine which barriers are most significant and therefore receive priority consideration.*

Commenter 5 – The Lands Council and Alliance for the Wild Rockies (TLC)

Firewood and impacts to Old Growth & Wildlife:

Comment 5-1: First off, it seems likely that firewood opportunities for the general public would be vastly reduced with such a project. As much as **18,415 acres** would be directly affected by tree removal.

> *Response 5-1: Not all of the 18,415 acres would be treated annually, as stated in the EA (p. 6), "It is anticipated that about 120 total miles of roadside salvage and vegetation removals for road maintenance purposes would be accomplished annually over a five-year period across the three districts." This means that in any one year 80% of the area identified for treatment would be NOT be subject to salvage. Thus, we anticipate ample opportunities for trees to die and blow down and become available for firewood gathering.*

It is recognized that personal-use firewood cutting opportunities on road segments included in this project could be limited in the short-term. As mentioned above, not every road segment will be harvested in the same year, and we expect ongoing tree mortality resulting in future firewood opportunities after roadside salvage operations have been complete. It is important to recognize that firewood removal along road segments varies greatly across the landscape, and is a function of distance to residences, snag quality and species, terrain (steepness), sight distance and relative abundance of snags.

Comment 5-2: Secondly, the loss of such firewood opportunities on 18,415 acres along project area roads could easily lead to loss of structural diversity from the IPNF in many other acres, due to the displacement of firewood gathering to other locations that would otherwise not be cut. This also increases the temptation to cut live trees, and in locations that are not permitted such as within old growth, areas beyond the permitted 200 feet from roads, and within Riparian Habitat Conservation Areas. Even if there was no such indirect effect on designated old growth, increased loss of structure on 18,415 other acres has impacts to wildlife that prefer old growth for the structure it provides. This effect is exacerbated by the cumulative loss of old growth, and loss of this structure in non-old growth, from past management.

Response 5-2: Firewood permits on the IPNF include conditions that provide protection for riparian areas and live trees. Illegal activity is always a possibility, but is no way specifically connected to this action. Additionally, it is beyond the scope of this project to account for illegal activity. There are no restrictions for gathering firewood in old growth stands, which would be extremely difficult to effectively administer. As far as effects on old growth, the IPNF's North Zone has nearly 142,000 acres of allocated old growth. Given only 270 acres of the proposed action intersect old growth stands, or less than 0.2% of the NZ's allocation, ***and*** *only road maintenance (no salvage) will be allowed in these stands, the proposed action is expected to have negligible impacts on allocated old growth.*

With regard to wildlife species, the Wildlife Report (p. 41) clearly acknowledges the possibility that personal use firewood cutters could be displaced to other previously unaffected areas, or that snag removal by firewood cutters could be more complete in already affected areas. To account for this potential effect, the analysis estimates the total number of acres, by Landscape Area, that could be impacted by firewood cutting (and potentially free of snags) for black-backed woodpecker (p. 38 - Table 10), dry-forest species (p. 48 - Table 11), fisher (p. 53 - Table 12), pileated woodpecker (p. 59 - Table 13) and American marten (p. 64 - Table 14). In each case, the total number of acres potentially affected by this proposal was not found to be a large percentage of the acres available to woodcutters, and was an inconsequential proportion of the North Zone as a whole.

Woody Debris:

Comment 5-3: "Large woody debris is essential for maintenance of sufficient microorganism populations and long-term site productivity." (Bussel 484 DEIS at 161.) In order to adequately analyze and disclose cumulative effects, in the context of such "essential" factors, field surveys of representative past logged areas must be performed in the project area. The large woody debris losses on 18,415 acres reduces the natural, ongoing ecological or restorative function of the lost structure (see TLC Comment Letter dated 4/20/12 for further details).

Response 5-3: Design features recommend course woody debris (CWD) levels based on Graham et al. (1994) and would protect against soil erosion as well as provide a long-term source of organic matter. Coarse woody debris recommendations for different sites are displayed in Table Soil-6 on page 13 of the Soils Report. . Under Alternatives 2 and 4, the proposed project would remove dead down, standing, and hazard trees. The EA recognizes that taking away these trees reduces recruitment of CWD; however. design criteria are in place to protect woody material

that is starting to rot, decompose, or would disturb the forest floor by being lifted up (Appendix A of Soils report page 22; EA page 26).

The Soils Report on page 17 states "Large woody debris would be maintained at recommended volumes (Graham et al. 1994) in each proposed activity area. All Alternatives would comply with this standard because existing CWD levels are generally satisfactory in the proposed salvage treatment area. Large woody debris retention would follow the research guidelines of Graham et al. (1994) to ensure the maintenance of site productivity. Coarse woody debris levels in public firewood cutting areas could be variable. Design criteria are in place to protect woody material that is starting to rot, decompose, or would disturb the forest floor by being lifted up. This includes blow down that is less than 50% sound."

Management Areas:

Comment 5-4: The EA does not demonstrate consistency with all relevant Forest Plan MA and forestwide standards, including those for wildlife, as well as other resources.

Response 5-4: The EA states on page 31 "Further analysis and conclusions about the potential effects are available in report for each resource and other supporting documents cited in those reports". Consistency with the Forest Plan standards can be found in the specialist reports on the following pages: Wildlife (pp. 15-65), Soils (pp. 16-17), Weeds (pp. 18-19), Fish (pp. 23-24), Hydrology (pg. 19), and Rare Plants (pp. 29-30).

Wildlife Surveys:

Comment 5-5: We doubt that the IPNF can do adequate surveys to determine if goshawk nesting areas would be present where cutting would occur. We are also concerned that the IPNF lacks adequate resources for surveys for nesting pileated woodpeckers, nesting flammulated owls, fisher or marten den sites, roosting Sensitive bats, other TES species, and Sensitive plants. Although roadsides are obviously lower habitat due simply to other disturbances, including up to 200 feet along roads still invokes lot of acres of potential habitat disturbance within those overall 18,415 acres.

Response 5-5: As discussed in the Wildlife Report (p. 89), it is unlikely that proposed salvage areas along open roads would be used as nest areas by a species that is sensitive to human disturbance during the nesting season. There are no known goshawk nests on the North Zone within 50 meters of an open road. Known and historic territories in the vicinity of proposed salvage areas would be surveyed for occupancy prior to activities taking place, as would areas of potentially suitable habitat with no previously documented goshawk use. No salvage would take place in allocated old growth stands, protecting what are presumably the best quality nest stands from disturbance. Similarly, the best quality denning/nesting habitat for pileated woodpeckers, flammulated owls, fisher, marten and roosting bats would not be impacted.

The possibility of loss of active nesting or denning sites for these species, while it exists, is remote. While fisher are not particularly sensitive to road-related disturbance, the presence of open roads may indirectly lead to mortality from increased trapper access (Wildlife Report p. 52) – making it less likely these areas would be used for densites. With regard to marten, loss of the occasional densite would be of minor consequence given the abundant and widespread nature of this species on the IPNF (Wildlife Report p. 63). Neither fringed myotis (Keinath 2004 p. 22) nor Townsend's big-eared bat (Pierson et al. 1999, Wildlife Report p. 83) have been documented using snags as maternity roosts or hibernacula in this portion of their range; and the potential loss of day roosts, even if occupied, would be of relatively minor consequence. The Wildlife Report (p. 60) also notes that it is unlikely that salvage would result in actual loss of pileated woodpecker nest trees, since these are highly prized by woodcutters and in most cases would already have been removed. Effects of potential snag loss on most species analyzed would

generally be confined to future nest/den sites since these species prefer snags in more advanced states of decay, while most salvage would take place in areas of recent deadfall or mortality. Finally, it is important to note that all proposed activity areas are currently subject to personal use firewood removal and other road-related disturbance.

Cumulative Effects:

Comment 5-6: Cumulative ecological impacts with timber sales and other ongoing projects are not addressed in sufficient detail in this EA.

Response 5-6: The EA discussed cumulative effects for the following resources with references to specific pages of resource reports for more specific information; Rare Plants Report (pp. 10-28), Soils Report (pp. 10-17), Hydrology Report (pp. 14-19), Fisheries Report (pp. 6-24), and Wildlife (pp. 12-67). The proposal would have insignificant cumulative effects on forest composition and forest structure. The process of salvaging dead and downed timber would not affect a change in forest composition; rather, the natural process (wind, insects and disease, fire, etc.) that caused the mortality would affect the change in species composition and structure. Additionally, no salvage of dead standing and down trees will occur in allocated old-growth stands. Since activities will be restricted to the road surface and cut and fill slopes where roads pass through allocated old growth stands no hazard trees will be removed beyond the cut/fill slope in allocated old growth stands. If hazard trees must be cut in these areas for public safety, they must be left on the ground. Consequently, the proposed action is expected to have insignificant cumulative effects on allocated old growth stands

Slash Piling:

Comment 5-7: It seems to us that if burn piles are needed to address slash (EA at 40), then the roadside cutting would be too heavy.

Response 5-7: The purpose of the treatment immediately adjacent to the roadside (within approximately 15 feet) is to clear and brush vegetation for the primary purposes of safety and visibility; it would be most consistent with a "fuel break" (void of most fuels including brush and trees, except some live fuels in the surface). Fuel breaks are designed to slow fire spread to allow for successful suppression.

Beyond the clearing and brushing zone, live crown fuels would be retained, thus, in many areas the dense crown structure would remain out beyond the clearing and brushing zone (Fire/fuels report pg. 3). Tree removal (salvage) of dead and hazard trees that would occur beyond the clearing zone would be intermittent and we do not expect the removal to be 'heavy' enough to require burn piles, although there could be root rot pockets or other pockets of mortality where several hazard trees may be felled. Utilization, rather than piling, would be the preferred method of addressing cut material. The primary allowance for piling – likely hand piling (a grapple pile could be utilized if it sat on the road) – would be to address any areas of heavy down fuels (trees, branches and other dead woody material already accumulated on the surface) and the likely infrequent situation of several trees salvaged in one area.

Design Criteria for fire and fuels as stated on page 3 of the report:

- *Excess activity created surface fuels (primarily the limbs and tops of cut trees) will either be removed from the site through utilization or piled and burned;*
- *Jackpot pile heavy concentrations of already downed woody fuels (not yet incorporated into the soil) to break-up continuity – this will slow fire spread in the case of a fire start, as well as mitigate an otherwise easy ignition source;*

- *Where not acceptable for soil quality standards, consider utilizing hand-piling to mitigate large concentrations of heavy down woody fuels.*

TAPS & Road densities:

Comment 5-8: We don't see how the Forest Service can now credibly state it needs all of the roads planned for roadside treatment for future management. Given the proper analysis, and involving the public in the process, many of those roads would likely drop off your list as being either needed or affordable.

We prefer that before deciding on which roads to treat, the IPNF first follow through on commitments to:

- Identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of NFS lands; and
- Identify roads that are no longer needed to meet forest resource management objectives and; therefore, scheduled for decommissioning or considered for other uses (36 CFR 212.5(b)).

Consistency of action alternatives with the directives implementing the 2005 Travel Management Rule is not demonstrated in the EA (see TLC Comment Letter page 4-5 for further details).

Response 5-8: The EA page 6 state: Travel Analysis Planning (TAPS) assesses the current forest transportation system and identifies issues, assesses benefits, problems, and risks to inform decisions related to identification of the minimum road system per CFR Part 212.5(b)(1) and designations of roads trails and areas for motor vehicle use per CFR Part212.51. Since this project does not propose to make any changes to the minimum roads system or designation of roads, and includes only road maintenance, a travel analysis is not required (FSM 7712.3).

Appendix C (page 3) of the EA further explains: "the North Zone Roadside Salvage project incorporates a travel analysis by virtue of the project itself, which includes a complete and accurate inventory of Forest Service roads included in this project, which have previously been identified as needed and designated in the Kaniksu Zone Motor Vehicle Use Map on May15, 2011. Road maintenance is the only action and a major component of the proposed action. Roads to be included in the project area for continued maintenance were agreed upon and analyzed by the project interdisciplinary team. Only the existing Forest Transportation System roads will be used and no changes will be made to road designations." All roads included in this project are part of the existing Forest Service Roads transportation system - many are arterial roads needed to access National Forest System lands.

Effects of landings to other resources:

Comment 5-9: "It is estimated that ¼ acre-sized landings may be needed for each mile of road to be treated in the project area…" (EA at 6.) It seems that the **number of** ¼ acre landings per mile was left out of this statement. Regardless, such new landings would be essentially small clearcuts and may result in an almost permanent losses of soil productivity, losses in vegetative diversity and funding due to noxious weed spreading and subsequent weed treatments, soil erosion, and loss of forest habitat diversity. These cumulative effects are not adequately analyzed and disclosed in the EA.

Response 5-9: The EA on page 6 states "Existing landings and turnout suitable for small landings would be utilized where feasible in order to minimize the need to create new ones". Worse case scenario, if suitable existing lands are not found, the proposed action would include a maximum of 612 miles of roads, or approximately 612 landings, which equates to approximately 150 acres dedicated to landings scattered across three Districts. Total lands dedicated to

landings as part of the 18,415-acre proposed action would be about 0.8%. Since the salvage component of the proposed action excludes treatments in allocated old growth this resource would not be affected. Additionally, 150 acres worth of ¼ acre openings scattered across three Ranger Districts that total nearly 1 million acres amounts to insignificant impacts on forest structure.

The Soils Report (pp. 11-17) and Weeds reports (pp. 9-18) adequately address cumulative effects associated with this subject. In addition design features to help control the spread of noxious weeds are included in the EA (pp. 27-29).

Roads effect on streams & fish habitat:

Comment 5-10: Forest Service hydrologist Johnson (1995) states, "For the roads we no longer actively use, our dwindling road maintenance budget will make it difficult to maintain the culvert crossings. When these fail during storm and runoff events, tremendous amounts of sediment can be delivered directly to the channel and from there down to lower streams with significant beneficial uses such as sensitive fish habitat."

Response 5-10: All proposed project activities would only occur on roads that are in a currently drivable condition. Watershed impacts from roads and roads with lack of maintenance are discussed throughout the affected environment and environmental consequences section of the hydrology report. Potential impacts stemming from a lack of road maintenance are disclosed on pages 11 and 14, including the statement "Culverts and other drainage structures can become plugged with debris and the subsequent flow over the road surface can cause failures." Road density issues are discussed on page 11 and are disclosed for each 6th code hydrologic unit in table 2. Specific road and trail problems found during field reviews can be found in the project file. Sediment yield estimates calculated from FS WEPP for project area road segments can be found beginning on page 14. In summary, the effects of the lack of road maintenance on water quality is fully discussed in the hydrology report.
